

Serial No. 09/863,960  
September 17, 2003  
Reply to the Office Action dated February 27, 2002  
Page 14 of 19

## REMARKS

Claims 1-45 are pending in this application. By this Amendment, Applicants AMEND claims 1-7, 9-13, and 15-17 and ADD claims 20-45.

Applicants appreciate the Examiner's indication that claim 13 would be allowable if rewritten in independent form including all of the features of the base claim and any intervening claims and that claim 15 is allowed.

The Examiner indicated that the drawings are considered informal because they fail to comply with 37 C.F.R. § 1.84(a)(1). Applicants will submit formal drawings which comply with 37 C.F.R. § 1.84(a)(1) when the application is allowed.

Claim 4 was objected to for containing an informality. Applicants have amended claim 4 to correct the informality noted by the Examiner. Accordingly, Applicants respectfully request reconsideration and withdrawal of this objection.

Claim 6 was rejected under 35 U.S.C. § 112, second paragraph for allegedly being indefinite. Applicants have amended claim 6 to correct the informalities noted by the Examiner. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

Claim 1-12, 14, 16 and 17 were rejected under 35 U.S.C. § 102(b) as being anticipated by Morlion et al. (U.S. 5,429,520 or U.S. 5,549,481). And claims 18 and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Morlion et al. Applicants respectfully traverse these rejections.

Claim 1 has been amended to recite:

1. An electrical connector, comprising:

a plurality of electrically conducting members;

a first electrically conducting plate; and

a second electrically conducting plate positioned opposite to and oriented substantially in parallel with the first electrically conducting plate; and

a first and second plurality of substantially parallel elongated electrically

Serial No. 09/863,960  
September 17, 2003  
Reply to the Office Action dated February 27, 2002  
Page 15 of 19

conducting fingers;

**wherein each of the first and second plurality of fingers is capable of being independently and selectively manipulated such that some of the first and second plurality of fingers electrically connect a respective one of the first and second electrically conducting plates to a corresponding one of the plurality of electrically conducting members and others of the first and second plurality of fingers do not electrically connect a respective one of the first and second electrically conducting plates to a corresponding one of the plurality of electrically conducting members** (emphasis added).

Claim 9 has been amended to recite:

9. An electrical connector device, comprising:  
a housing;  
a plurality of electrically conducting fingers in electrical communication with a ground potential; and  
a plurality of electrically conducting members extending at least partially into the housing;

**wherein each of the plurality of fingers is arranged to be selectively and independently plastically deformed such that a first group of the plurality of fingers are electrically connected to a respective one of the plurality of electrically conducting members and a second group of the plurality of fingers are not electrically connected to a respective one of the plurality of electrically conducting members** (emphasis added).

Claim 12 has been amended to recite:

12. An electrical connector apparatus, comprising:  
a housing adapted to receive electrically conducting members;  
a plurality of spaced electrically conducting members extending into the housing;

Serial No. 09/863,960  
September 17, 2003  
Reply to the Office Action dated February 27, 2002  
Page 16 of 19

and

a plurality of elongated electrically conducting fingers in electrical communication with one another and with a ground potential;

wherein the electrically conducting fingers are positioned such that each of the plurality of electrically conducting members is substantially opposite a respective one of the first plurality of elongated electrically conducting fingers; and

**wherein each respective one of the plurality of elongated electrically conducting fingers positioned opposite one of the plurality of spaced electrically conducting members may be independently and selectively positioned such that a first group of the plurality of fingers are electrically connected to a respective one of the plurality of electrically conducting members and a second group of the plurality of fingers are not electrically connected to a respective one of the plurality of electrically conducting members** (emphasis added).

Claim 16 has been amended to recite:

16. A method for producing an electrical connector, comprising the steps of:
  - a) providing a plurality of electrically conducting members disposed opposite to each other;
  - b) providing at least two of ground plates disposed opposite to each other;
  - c) providing a plurality of electrically conducting elongated fingers at a position such that the plurality of electrically conducting elongated fingers are capable of electrically connecting one of the plurality of electrically conducting members with one of the at least two ground plates; and
  - d) **processing individual ones of the plurality of elongated fingers such that each of a first group of the plurality of elongated fingers electrically connects one of the plurality of electrically**

Serial No. 09/863,960  
September 17, 2003  
Reply to the Office Action dated February 27, 2002  
Page 17 of 19

**conducting members with one of the at least two ground plates and each of a second group of the plurality of elongated fingers does not electrically connect one of the plurality of electrically conducting members with one of the at least two ground plates** (emphasis added).

As described on page 2 of the originally filed specification, the prior art suffered from the problem that unique electrical connectors must be provided for each pair of devices to be connected and no prior art solution allowed for an easily customized pattern of grounded electrical contacts in a connector.

Applicants' claimed invention provides the feature of a plurality of electrically conductive fingers that are arranged such that each of the plurality of fingers can be selectively and independently processed or manipulated such that a first group of the plurality of fingers are electrically connected to a respective one of the plurality of electrically conducting members and a second group of the plurality of fingers are not electrically connected to a respective one of the plurality of electrically conducting members.

The Examiner alleged that Morlion et al. teaches all of the features and method steps recited in claims 1, 9, 12 and 16 of the present application. Particularly, the Examiner alleged that Morlion et al. discloses "an electrical connector comprising opposing first and second electrically conductive plates 19 with fingers 23 which may be independently bent." Applicants respectfully disagree.

In contrast to the present claimed invention, NONE of the fingers 23 of Morlion et al. can be selectively and independently processed or manipulated. In addition, Morlion et al. clearly fails to teach or suggest that a first group of a plurality of fingers are electrically connected to a respective one of the plurality of electrically conducting members and a second group of the plurality of fingers are not electrically connected to a respective one of the plurality of electrically conducting members

Serial No. 09/863,960  
September 17, 2003  
Reply to the Office Action dated February 27, 2002  
Page 18 of 19

ALL of the “fingers” or contact springs 23 of Morlion et al. MUST be deformed and electrically contact the ground contact plates 17 when the ground contact plates 17 are inserted in the coupled position of Fig. 1. The Examiner’s attention is invited to Column 4, lines 3-15 of Morlion et al.

A comparison of Fig. 2 and Fig. 1 of Morlion et al. clearly illustrates that in the uncoupled position shown in Fig. 2, the contact springs 23 are NOT deformed or manipulated, but when the ground contact plate 17 is inserted into the connector part 4 shown in Fig. 2, ALL contact springs 23 MUST be deformed at the same time and ALL contact springs 23 are electrically connected to the ground contact plate 17.

Thus, instead of teach or suggesting Applicants’ claimed invention, Morlion et al. clearly teaches away from the present claimed invention.

Accordingly, Applicants respectfully submit that Morlion et al. fails to teach or suggest the unique combination and arrangement of elements and steps recited in claims 1, 9, 12 and 16 of the present application. Claims 2-8, 10, 11, 13, and 17-19 depend upon claims 1, 9, 12 and 16, and are therefore allowable for at least the reasons that claims 1, 9, 12 and 16 are allowable. In addition, claim 15 is allowed as indicated by the Examiner.

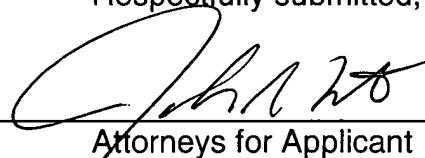
In addition, the prior art fails to teach or suggest the unique combination of elements recited in newly added claims 20-45.

In view of the foregoing amendments and remarks, Applicants respectfully submit that this application is in condition for allowance. Favorable consideration and prompt allowance are solicited.

Serial No. 09/863,960  
September 17, 2003  
Reply to the Office Action dated February 27, 2002  
Page 19 of 19

The Commissioner is authorized to charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1353.

Respectfully submitted,



John R. Keating  
Atorneys for Applicant

Joseph R. Keating  
Registration No. 37,368

Christopher A. Bennett  
Registration No. 46,710

**KEATING & BENNETT LLP**  
10400 Eaton Place, Suite 312  
Fairfax, VA 22030  
Telephone: (703) 385-5200  
Facsimile: (703) 385-5080